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FILED

APR 11 2022

U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

Debtor

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

In re:

MICHAEL HAROUTUN MIROYAN

Debtor.

Case Number: 18-52801-MEH
Chapter 13

MOTION FOR VIOLATING THE
AUTOMATIC STAY


Please take note that Debtor Michael Miroyan on the Date and Time noted above shall move this Court for damages against lawyer Karyn Doi, and her client Gang Chen, in the amount of \$500,000 consisting of actual damages, punitive damages and attorneys fees for intentionally violating the automatic stay in this case that came into effect in this case on 11-26-2018. On 12-20-2018, Gang Chen, through his attorney Karyn Doi filed papers seeking Summary Judgment in Hawaii's Third Circuit Court in Case Number 16-1-00043K, which was granted by Judge Robert D.S. Kim on 3-8-2019. As a result, since both the filing of papers and the issuance of an Order in the Chen civil case were done in violation of the Automatic Stay, the Order granting Summary Judgment is Void. Debtor therefore seeks a Declaratory Judgment issued by this Court declaring that the 3-8-2019 Summary Judgment Order is Void.

This Motion is based upon this Notice, the supporting Declaration of Michael Miroyan with supporting Exhibits, the Memorandum of Points and

1 Authorities in support of this Motion, a [Proposed] Order for the Court, a
2 Certificate of Service any any oral argument made at the hearing.

3 *April 11, 2022*
4 Dated: ~~February 14th 2022.~~ *m*

Respectfully submitted,

5 
6 Michael Miroyan
7 Debtor